

**Comments on text resulting from the Terrestrial Animal Health Code  
Commission Report - December, 2003 Meeting  
Submitted by the United States of America on July 13, 2004**

**Guidelines for the Slaughter of Animals for Human Consumption**

The United States supports the World Organization for Animal Health (OIE) in its initiative to enhance its leadership role in providing global animal welfare guidance and standards. We concur with the importance of science-based standards and the significance of incremental change and commitment to continuous improvement taking into account regional, religious, and cultural issues that may impact the establishment of animal welfare guidelines.

**General comments**

We have a general comment regarding clarification on whether the feed and water husbandry requirements included in the definition of lairaging within the report apply to poultry. For example: in Article 2, Requirements for animals delivered in containers, bullet — 3, the proposed text states “Animal which have been transported in containers should be slaughtered as soon as possible etc... Animals which have not been slaughtered within 12 hours of the arrival should be fed, and should subsequently be given moderate amounts of food at appropriate intervals.” ; Article 3, Lairage design and construction, Design, bullet — 3, the third sentence states “drinking water should always be available to the animals, etc...”; and Article 4, Care in lairages, bullet — 4, proposed text states “Suitable drinking water should be available to the animals on their arrival and at all times to animals in lairages unless they are to be slaughtered without delay”.

Routinely during poultry transport from grow-out houses to the processing facilities, the animals are under a feed withdrawal period, which is necessary for human food safety concerns. If the animals are not removed from feed with sufficient time prior to processing, the resulting product can become contaminated with fecal material and human pathogens, such as *Salmonella spp.* and *Campylobacter spp.* Based on the human food safety issues associated with the feeding and watering requirements of poultry contained in the text of Articles 3 and 4, clarification is requested on whether the proposed text concerning lairage requirements pertain to poultry.

## **Specific comments**

We are submitting the following comments to specific text contained within the Guidelines for the Slaughter of Animals for Human Consumption.

### **Article 1 General principles for slaughter**

#### **Personnel**

Proposed wording in this section is somewhat confusing and ambiguous. In the first paragraph, second sentence, it states: “For this reason, there should be a sufficient number of personnel, who should be patient, considerate, competent and familiar with the provisions in these guidelines and in applicable legislation”. We agree that the personnel should be patient, considerate and competent. However the wording “familiar with the provisions in these guidelines and in applicable legislation” is misleading and implies a specific requirement that personnel should be knowledgeable of the OIE guidelines and legislation and not the compatible, individualized and equivalent requirements of the Member country.

Therefore, we recommend the following change in the text: “For this reason, there should be a sufficient number of personnel, who should be patient, considerate, competent and familiar with provisions in guidelines, programs and/or regulations authorized by the Member Country’s Veterinary Services that are compatible with the guidelines within this document.”

#### **Animal Behavior**

Clarification is needed for the word “free-moving” contained in the second sentence of the third paragraph which reads: “In free-moving animals, to exploit herding and following behavior, animals for slaughter should be kept etc...” The use of the term “free-moving” is vague. Does the term refer to domestic animal species, such as cattle or swine which move somewhat independently through passageways/races in comparison to poultry, which involve more direct transfer and handling by personnel? Clarification and/or a definition for the term “free-moving” would alleviate any potential confusion on the intent of the guideline.

The current text in the fourth paragraph of the Animal Behavior section is “Animals which are unaccustomed or hostile to each other should not be mixed at slaughterhouses”. We recommend the proposed text read “As far as possible, established groups of animals should be kept together. Animals hostile to each other should be separated at slaughterhouses”. This change in the text is recommended because it is compatible with the proposed wording in Article 4, the first bulleted item of this document and it is an appropriate animal husbandry practice.

In the sixth paragraph, third sentence the text is “Animals reared in close proximity to humans i.e. tame have not flight zone etc...” should read “Animals reared in close proximity to humans i.e. (tame) have no flight zone etc...”. The addition of the

parentheses around the word “tame” improves the comprehension of the text by the reader.

## **Article 2**

### **Methods for restraining and containing animals**

The proposed text states: Methods of restraint causing avoidable suffering, such as the following, should not be used in conscious animals:

Bullet 1— suspending or hoisting animals (other than poultry or rabbits) by the feet or legs.

However, the text under Article 2, Moving and handling animals, bullet item 7, states: Animals should be grasped or lifted in a manner which avoids pain or suffering and physical damage (e.g. bruising, fractures, dislocations). Lifting rabbits by the legs causes bruising to the muscle and or fractures of the spine. We recommend that the proposed text of Article 2, Bullet 1 — should read “suspending or hoisting animals (other than poultry) by the feet or legs”.

## **Article 3**

### **Lairage design and construction**

#### **Design**

Bullet 2 — There is a typographical error in the text of the second bullet. The proposed text states: Pens, passageways and races should be arranged in such a way as to permit inspection of any animal at any **rime**, and to etc... We recommend that the corrected text should read: Pens, passageways and races should be arranged in such a way as to permit inspection of any animal at any **time**, and to etc...

Bullet 4 — The second sentence of the proposed text states: “Where feed troughs are provided, they should be placed along the walls rather than in the centre of the pens, and should be sufficient in number to allow all animals to feed undisturbed”. Based on the behavioral characteristics of social animals that are group-housed, the opportunity to feed by all of the animals undisturbed is not practical or realistic. We recommend the proposed text should read: “Where feed troughs are provided, they should be placed along the walls rather than in the centre of the pens, and should be sufficient in number to allow all animals access to feed to fulfill their physiologic needs”.

### **Article 3**

#### **Lairage design and construction**

##### **Construction**

Bullet 2 — The second sentence of the proposed text states “Where necessary floors should be insulated or provided with appropriate bedding.” However, there is no requirement that the bedding must be maintained. We suggest that the proposed text read: “Where necessary floors should be insulated or provided with appropriate bedding that is maintained as needed to insure the health and safety of the animals”.

### **Article 4**

##### **Care in lairages**

This is a general comment in reference to the text within this Article and several of the Articles in the Guidelines for the Slaughter of Animals for Human Consumption. Much of the information in this Article (e.g., bullets 1, 2, 4, 5, and 7) duplicates exact wording contained in other Articles within the Guidelines for the Slaughter of Animals for Human Consumption. We recommend that the ad hoc group consider consolidating the repetitive text as indicated within the document.

Bullet 8 — The proposed text states “The condition and state of health of the animals in a lairage should be inspected at least every morning and evening by a veterinarian, or under the latter’s responsibility, by another competent person. Animals which are sick, weak, injured or showing visible signs of distress should be killed immediately”.

The wording of the first sentence of bullet 8 is awkward. We recommend that first sentence read “The condition and state of health of the animals in a lairage should be inspected at least every morning and evening by a qualified veterinarian or their competent designee.

The text of the second sentence does not permit veterinary intervention to treat animals that are “sick, weak, injured or showing visible signs of distress. We recommend that professionally accepted veterinary treatment of animals should be considered as an alternative to immediate killing. Additionally, an option should be provided to allow animals that are exhausted or overheated to rest or cool before they are moved to slaughter or euthanatized. We recommend the second sentence of bullet 8 should read: Animals that are exhausted or overheated and not in extreme distress should be allowed to rest or cool before they are moved to slaughter or killed. Other animal that are sick, injured, or showing visible signs of distress should be promptly treated by a veterinarian of killed immediately.

We suggest that the feeding and watering troughs in the lairages be routinely cleaned.

## **Article 5**

### **Management of fetuses during slaughter of pregnant animals**

Bullets 3 and 4 — Both bullets refer to the recommendation concerning the amount of time that should elapse between the instant the maternal neck or chest cut and the opening of the uterus to remove the fetus. The time periods cited in each bullet reference the identical activity but are not consistent. (i.e. bullet 3 states “When uterine, placental or foetal tissues are to be collected, where practical, fetuses should not be removed from the uterus until 15 to 20 minutes after the maternal neck or chest cut”, as opposed to bullet 4 which states “Foetuses should not be removed from the uterus sooner than five minutes after the maternal neck or chest cut. It is recommended that the reference to the amount of time that should elapse before a foetus is removed from the uterus of an animal during slaughter is consistent within the document.

Bullet 5 — The proposed text contains a typographical error. We recommend the text read “A living fetus removed from the uterus must be prevented from inflating its lungs and breathing air”.

Bullet 6 — States “A foetus which may breath air, or which is exposed earlier than the 5 minute minimum waiting time after slaughter of the pregnant animals, must be killed with a captive bolt firearm or a blow to the head with a suitable blunt instrument”. This bullet makes reference to a ‘captive bolt firearm’ but does not distinguish between ‘penetrating’ and ‘nonpenetrating’ captive bolts. According to the AVMA’s Panel on Euthanasia (as provided in the most recent report, the 2000 Report of the AVMA Panel on Euthanasia, “The nonpenetrating captive bolt must not be used as a sole method of euthanasia.” The AVMA panel’s report primarily addresses adult animals, and the proposed bullet 6 of this OIE guideline addresses neonates, however, we believe it would be appropriate for the guidelines to specify the use of a ‘penetrating’ captive bolt. The text in bullet 6 would read “must be killed with a penetrating captive bolt firearm”.

Bullet 6 — We do not agree with the proposed text in bullet 6 which appears to state that “or a blow to the head with a suitable blunt instrument” is an acceptable form of euthanasia for neonates of all species covered by the proposed guideline. Accordingly, the AVMA euthanasia panel report: “Euthanasia by a blow to the head must be evaluated in terms of the anatomic features of species on which it is to be performed”. A blow to the head can be a humane method of euthanasia for neonatal animals with thin craniums, such as young pigs, if a sharp blow delivered to the central skull bones with sufficient force can produce immediate depression of the central nervous system and destruction of brain tissue. When properly performed, loss of consciousness is rapid. The anatomic features of neonatal calves, however, make a blow to the head in this species unacceptable. We recommend that the OIE clarify its use of the recommendation of “blow to the head” by including appropriate species –specific information in the proposed text.